

EXHIBIT 2
**PREVIOUSLY
FILED UNDER SEAL**

8/27/2024

VirtaMove Corp. v. Amazon.com, Inc., et al Susan Cameron 30(b)(6)

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<p>IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND/ODESSA DIVISION</p> <p>VIRTAMOVE, CORP.,) Plaintiff,) Case Number: V.) 7:24-CV-00030) AMAZON.COM, INC.; AMAZON.COM) SERVICES LLC; and AMAZON WEB) SERVICES, INC.,) Defendants.)</p> <p>30(b)(6) DEPOSITION OF SUSAN CAMERON ON BEHALF OF VIRTAMOVE, CORP. August 27, 2024 11:02 a.m. Eastern Daylight Time</p> <p>Reported by: Lori J. Goodin, RPR, CRR, RSA, California CSR #13959</p> <p>DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646</p>	<p>1 INDEX TO EXAMINATION</p> <p>2</p> <p>3 WITNESS: SUSAN CAMERON</p> <p>4 EXAMINATION BY PAGE</p> <p>5 MR. ANAPOL 6</p> <p>6 MR. TONG 215</p> <p>7 MR. ANAPOL 218</p> <p>8</p> <p>9 INDEX TO EXHIBITS</p> <p>10 SUSAN CAMERON</p> <p>11 VirtaMove, Corp. V. Amazon.com, Inc., et al</p> <p>12 Tuesday, August 27, 2024</p> <p>13 Lori J. Goodin, RPR, CRR, RSA,</p> <p>14 California CSR #13959</p> <p>15 EXHIBIT DESCRIPTION PAGE</p> <p>16 Exhibit 1001 VM_AMAZON_0001097, Travel</p> <p>17 Itinerary for Mr. Topitsch</p> <p>18 to Texas, 1/28/16 33</p> <p>19 Exhibit 1002 VM_AMAZON_0001123,</p> <p>20 Registration for Greg O'Connor</p> <p>21 to attend AWS re:Invent,</p> <p>22 8/17/15 57</p>
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<p>1 REMOTE APPEARANCES:</p> <p>2</p> <p>3 FOR PLAINTIFF:</p> <p>4 RUSS AUGUST & KABAT</p> <p>5 BY: PETER TONG, ESQUIRE</p> <p>6 4925 Greenville Avenue, Suite 200</p> <p>7 Dallas, Texas 75206</p> <p>8 310-826-7474</p> <p>9 ptong@raklaw.com</p> <p>10</p> <p>11</p> <p>12 FOR DEFENDANTS:</p> <p>13 KNOBBE MARTENS OLSON & BEAR LLP</p> <p>14 BY: JEREMY ANAPOL, ESQUIRE</p> <p>15 2040 Main Street, 14th Floor</p> <p>16 Irvine, California 92614</p> <p>17 949-760-0404</p> <p>18 jeremy.anapol@knobbe.com</p> <p>19</p> <p>20 Also Present:</p> <p>21 Billy Fahnert, Videographer/Document Tech</p> <p>22</p>	<p>1 INDEX TO EXHIBITS, CONT</p> <p>2 EXHIBIT DESCRIPTION PAGE</p> <p>3 Exhibit 1003 VM_AMAZON_0001195,</p> <p>4 Registration for Greg O'Connor</p> <p>5 to attend AWS re:Invent,</p> <p>6 10/30/13 61</p> <p>7 Exhibit 1004 Press Release from</p> <p>8 VirtaMove's website, 4/28/21 121</p> <p>9 Exhibit 1005 VM_AMAZON_0001089,</p> <p>10 payoff letter, 7/25/18 172</p> <p>11 Exhibit 1006 VM_AMAZON_0001309, photo</p> <p>12 of patent and trademark docs 176</p> <p>13 Exhibit 1007 VM_AMAZON_0000865, Trigence</p> <p>14 Corp. Technical Submission,</p> <p>15 FY 2004 183</p> <p>16 Exhibit 1008 Plaintiff's First Supplemental</p> <p>17 Objections and Responses to</p> <p>18 Defendants' First Set of Venue</p> <p>19 Requests for Interrogatories 203</p> <p>20</p> <p>21</p> <p>22 (Newly marked exhibits retained by reporter.)</p>

1 (Pages 1 to 4)

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1 **Q. Okay. So, in 2021, when this**
 2 **contact occurred between Mr. Stokes and**
 3 **Mr. Chanana, you hadn't spoken to any attorneys**
 4 **about the patents at issue in the case today?**
 5 A. No. Not that I remember. No.
 6 **Q. And at that time in 2021, did you**
 7 **believe that Amazon was infringing any VirtaMove**
 8 **patents?**
 9 MR. TONG: Objection. Calls for
 10 legal conclusion.
 11 THE WITNESS: I'm not a lawyer. I'm
 12 not sure that I can answer that question for
 13 you adequately.
 14 BY MR. ANAPOL:
 15 **Q. Okay. And just to be clear, it is**
 16 **not a question about whether your legal analysis**
 17 **is correct.**
 18 **It is just a question about what**
 19 **your belief was. So, you may have been right.**
 20 **You may have been wrong. You may have had no**
 21 **belief.**
 22 **But, my question is, in 2021, did**

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1 I don't remember. I don't really know.
 2 BY MR. ANAPOL:
 3 **Q. Okay. At any time before the**
 4 **lawyers got involved in 2023, did someone at**
 5 **VirtaMove, who is not a lawyer, tell you that**
 6 **they thought Amazon was infringing VirtaMove's**
 7 **patents?**
 8 MR. TONG: Same objection. Caution
 9 the witness not to reveal privileged
 10 information or any privileged analysis that
 11 may have been passed on by a lawyer.
 12 If you can answer the question
 13 without revealing privileged information, go
 14 ahead.
 15 THE WITNESS: Yes.
 16 BY MR. ANAPOL:
 17 **Q. And when did someone at VirtaMove**
 18 **tell you they thought Amazon was infringing**
 19 **VirtaMove's patents?**
 20 MR. TONG: Same caution to the
 21 witness.
 22 THE WITNESS: I don't remember

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1 **you believe that Amazon was infringing**
 2 **VirtaMove's patents.**
 3 MR. TONG: Same objection. You can
 4 answer the question.
 5 THE WITNESS: To be honest, I don't
 6 really have an opinion on it.
 7 BY MR. ANAPOL:
 8 **Q. Okay. And you didn't have an**
 9 **opinion in 2021?**
 10 A. No.
 11 **Q. Did anybody at VirtaMove talk to you**
 12 **in 2021 and express a belief that Amazon was**
 13 **infringing VirtaMove's patents?**
 14 MR. TONG: Objection. Caution the
 15 witness not to reveal privileged information
 16 or any privileged analysis.
 17 If you can answer the question
 18 without revealing privileged information, go
 19 ahead.
 20 If you have questions about it, we
 21 can talk. But, go for it.
 22 THE WITNESS: I don't really know.

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1 exactly, but it was probably early 2023.
 2 BY MR. ANAPOL:
 3 **Q. And who told you that?**
 4 MR. TONG: Same caution.
 5 THE WITNESS: A company called
 6 Lumenci.
 7 BY MR. ANAPOL:
 8 **Q. And did that company approach**
 9 **VirtaMove about the patents?**
 10 MR. TONG: Jeremy, I need -- sorry.
 11 You can -- we are getting into privileged
 12 materials here. I need to have a privilege
 13 discussion with the witness.
 14 You can go ahead and answer this one
 15 question, but I need, I need to pull the
 16 witness. And it is probably time for a lunch
 17 break, too.
 18 BY MR. ANAPOL:
 19 **Q. So, the one question that is pending**
 20 **right now is did that company, Lumenci, approach**
 21 **VirtaMove about the patents?**
 22 A. No, I don't think so.

20 (Pages 77 to 80)

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1 MR. ANAPOL: Okay. Peter, you need
 2 to take a break to confer about privilege?
 3 MR. TONG: Yes.
 4 MR. ANAPOL: Okay. I don't want to
 5 take a lunch break right now. I have a
 6 couple more questions that I want to ask
 7 after you confer about privilege. And then
 8 we can take a lunch break.
 9 MR. TONG: Okay.
 10 THE VIDEOGRAPHER: Okay. Going off
 11 the record. The time is 12:49.
 12 (Recess taken -- 12:49 p.m.)
 13 (After recess -- 12:53 p.m.)
 14 THE VIDEOGRAPHER: We are back on
 15 the record. The time is 12:53.
 16 MR. TONG: This is Peter Tong. I
 17 just want to make a note on the record that
 18 we object into questions about Lumenci.
 19 Lumenci and all of its work is privileged.
 20 We are asserting attorney/client
 21 communications as well as work product. And
 22 we are clawing back the answer about Lumenci.

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1 MR. ANAPOL: So, Peter, are you
 2 representing that Lumenci, these people at
 3 Lumenci are attorneys?
 4 MR. TONG: I'm asserting that this
 5 work was done in anticipation of litigation
 6 and their work product was in fact
 7 communicated to attorneys.
 8 And they worked with attorneys. So
 9 all of this is privileged.
 10 BY MR. ANAPOL:
 11 **Q. Okay. So, Ms. Cameron, at the time**
 12 **of these communications you mentioned with**
 13 **Lumenci, had VirtaMove retained attorneys for**
 14 **this litigation yet?**
 15 MR. TONG: Objection. Caution the
 16 witness not to reveal privileged information.
 17 If you have a question about whether
 18 or not the answer is privileged, we can have
 19 another discussion.
 20 THE WITNESS: So the answer would be
 21 no.
 22 BY MR. ANAPOL:

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1 **Q. So, did VirtaMove find Lumenci or**
 2 **did Lumenci find VirtaMove?**
 3 MR. TONG: Objection. Privilege.
 4 Instruct the witness not to answer.
 5 THE WITNESS: I won't answer that
 6 question.
 7 BY MR. ANAPOL:
 8 **Q. Were the people you spoke to at**
 9 **Lumenci in Texas, California or neither?**
 10 A. Both, I think.
 11 **Q. Where in California?**
 12 A. I don't know.
 13 **Q. It looks like they have an office in**
 14 **Redwood City, California which is in Silicon**
 15 **Valley.**
 16 **Does that sound right?**
 17 A. It could be. I don't know.
 18 **Q. Okay. So, after this contact with**
 19 **Lumenci but before VirtaMove filed this lawsuit,**
 20 **did anybody at VirtaMove communicate with Amazon?**
 21 A. I don't know. I can't speak on
 22 behalf of my colleagues. I can only tell you

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1 that I don't know.
 2 **Q. Okay. But you understand that you**
 3 **have been designated by VirtaMove to testify**
 4 **about pre-suit communication between VirtaMove**
 5 **and Amazon, right?**
 6 A. Right.
 7 **Q. And you understand that you had an**
 8 **obligation to prepare to testify on that topic?**
 9 A. Yes.
 10 **Q. So, you have been designated to**
 11 **speak on behalf of your colleagues. Do you**
 12 **understand that?**
 13 A. Yes.
 14 **Q. So, after this contact with Lumenci**
 15 **but before VirtaMove filed this lawsuit, did**
 16 **anybody at VirtaMove communicate with Amazon?**
 17 A. Not to my knowledge.
 18 **Q. And, between 2021 when Mr. Stokes**
 19 **talked to Mr. Chanana, and 2023 when this contact**
 20 **with Lumenci occurred, were there any other**
 21 **communications with Amazon?**
 22 A. Not to my knowledge.

21 (Pages 81 to 84)

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1 **Q. So, before the contact in 2023 with**
 2 **Lumenci, did anybody at VirtaMove tell anybody at**
 3 **Amazon that Amazon was infringing VirtaMove's**
 4 **patents?**
 5 A. Not to my knowledge.
 6 **Q. And before the contact in 2023 with**
 7 **Lumenci, did anybody at VirtaMove tell you that**
 8 **they thought Amazon was infringing VirtaMove's**
 9 **patents?**
 10 A. I'm sorry. Can you repeat that?
 11 **Q. So, before the contact in 2023 with**
 12 **Lumenci, did anybody at VirtaMove tell you that**
 13 **they thought Amazon was infringing VirtaMove's**
 14 **patents?**
 15 A. Did anyone at VirtaMove tell me that
 16 they thought; is that what you are asking me?
 17 **Q. Correct.**
 18 A. Yes, I suppose so.
 19 **Q. When?**
 20 A. I would be guessing. I couldn't say
 21 with certainty. I'm not sure when.
 22 **Q. Who told you that?**

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1 A. Still Nigel Stokes.
 2 **Q. Did Nigel Stokes tell you that he**
 3 **thought Amazon was infringing VirtaMove's patents**
 4 **before or after he spoke with Mr. Chanana?**
 5 A. After, I believe.
 6 **Q. Did Mr. Stokes speak with anybody at**
 7 **Amazon other than Mr. Chanana?**
 8 A. I don't know.
 9 **Q. But when you met with Mr. Stokes to**
 10 **prepare for this deposition, he did not tell you**
 11 **about any contact with Amazon personnel other**
 12 **than Mr. Chanana, correct?**
 13 A. We discussed Mr. Chanana.
 14 **Q. And nobody else at Amazon, correct?**
 15 A. Right.
 16 MR. ANAPOL: Okay. We can take a
 17 lunch break, Peter.
 18 MR. TONG: Okay. Let's go off the
 19 record.
 20 THE VIDEOGRAPHER: Okay. Going off
 21 the record. The time is 1:00 p.m.
 22 (Recess taken -- 1:00 p.m.)

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1 (After recess -- 1:46 p.m.)
 2 THE VIDEOGRAPHER: We are back on
 3 the record. The time is 1:46.
 4 BY MR. ANAPOL:
 5 **Q. Okay, Ms. Cameron. Welcome back.**
 6 **I have some housekeeping questions**
 7 **for you about the communications with Lumenci in**
 8 **early 2023 before the lawyers got involved.**
 9 **So, could you give me the names of**
 10 **those people involved in those communications?**
 11 MR. TONG: Objection, privileged.
 12 Instruct the witness not to answer.
 13 MR. ANAPOL: The names of
 14 participants in that communication cannot be
 15 privileged, Peter. You have to put it on
 16 your privilege log.
 17 MR. TONG: They are nontestifying
 18 consultants in this case. I don't believe we
 19 have to disclose them.
 20 MR. ANAPOL: So, you are refusing to
 21 give me the names of the people involved in
 22 these communications?

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1 MR. TONG: Yes.
 2 BY MR. ANAPOL:
 3 **Q. Okay. At the time of these**
 4 **communications in early 2023, before the lawyers**
 5 **got involved, were you -- was VirtaMove -- strike**
 6 **that.**
 7 **At the time of these communications**
 8 **in early 2023 before the lawyers got involved,**
 9 **did VirtaMove have a contract with the people who**
 10 **participated in these communications?**
 11 MR. TONG: Objection, privilege.
 12 Instruct the witness not to answer.
 13 BY MR. ANAPOL:
 14 **Q. Does VirtaMove have any contract**
 15 **with Lumenci?**
 16 MR. TONG: Objection, privilege.
 17 Instruct the witness not to answer.
 18 BY MR. ANAPOL:
 19 **Q. Are you following your counsel's**
 20 **instructions not to answer my questions?**
 21 A. Excuse me. Yes, of course. I'm
 22 following instruction not to answer.

22 (Pages 85 to 88)